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Peggy Arvanitas

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AIRBORNE DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street SW
12th Street Lobby, TW-A325
Washington DC 20554

RE: CC Docket 99-200

Dear Ms. Roman Salas,

Enclosed find the original and four copies of the Filing for myself, Peggy Arvanitas. I am enclosing a copy of this letter for you to stamp "received" and deliver same to me. I am serving all parties of record with copies of the enclosed. Thank-you for your help.

Please call me if you have any questions.

Sincerely,

Peggy Arvanitas

First Class

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Numbering Resource)CC Docket No.99-200
Optimization)
)

REPLY COMMENTS AND RECONSIDERATION COMMENTS OF
PEGGY ARVANITAS

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Introduction and General Comments

I, Peggy Arvanitas, hereby submit my reply comments in support and reconsideration of various issues related to number optimization measures in Docket No. 99-200. I agree with Florida California, and Maine Public Service Commission's comments in this docket, and therefore support them in full. My reconsideration comments are: (1) Require all carriers seeking growth numbering resources to report utilization reports and make them public, (2) NANPA and States to participate in joint numbering activities, (3) Taxation without explanation, (4) CMRS carriers should participate pooling in January 1, 2001, (5) Mandatory thousand pooling in top MSAs at least 6 NPAs per quarter, (6) Unreliable Nanpa Exhaust Study, (7) Mandatory use of NPAC software release 1.4 pooling until and if ever NPAC software release 3.0 becomes available, and (8) Models for AIN-Based Local Number Portability.

I also request the FCC that it (1) prohibit NANPA from awarding codes without

proper support, (2) enforce NANPA to withhold future codes for violation of state, industry, and federal rules and orders (i.e., Fines, forfeitures, and revocation can be used for violations), and (3) Mandate the implementation of number pooling in the top 100 MSAs immediately.

Background

On June 2, 1999, the FCC issued a Notice of Proposed Rulemaking (NPRM) on Numbering Resource Optimization. The NPRM solicited comments on a variety of measures intended to increase the efficiency with which telecommunications carriers use telephone numbering resources. In the NPRM, the FCC clearly acknowledged the existence of serious problems with the utilization of numbering resources. The NPRM addressed the underlying causes of area code exhaustion so that consumers are spared the enormous costs and inconveniences associated with the introduction of new area codes. The FCC recognized that implementing new area codes was not a solution that can continue indefinitely, considering the finite number of area codes.

On March 31, 2000, the FCC issued its report and order and further notice of proposed rule making. Although, in general, I agree with the majority of the FCC's administrative and technical measures to monitor the way numbering resources are used within the North American Numbering Plan (NANP), I have some concerns and would address these issues within this filing based on some of the comments filed by various individuals, state commissions and the industry.

In the FCC 00-104, the FCC sought comments on four issues: 1) what national utilization threshold the Commission should adopt for carriers seeking additional numbering resources (NPRM, ¶ 248); 2) whether covered commercial mobile radio service (CMRS) carriers should be required to participate in pooling immediately upon their implementation of local number portability (LNP) no later than November 24, 2002 (¶ 249); 3) how a market-based number allocation system could be implemented (¶ 251) and 4) what costs and what quantity of those costs appropriately should be included in

a recovery mechanism for number pooling costs ([] 253).

Reply Comments

1. Require all carriers in the top 100 MSAs be LRN/LNP capable

It is ironic that states are ordering the implementation of 1,000-block number pooling, but state commissions are not aware if the Local Exchange Companies (LECs) are LNR/LNP capable to engage in number pooling. On June 2, 2000, California Commission staff and the people of the State of California filed an ex-parte letter. In that, they stated that some wireline carriers in the pooling areas are not capable of porting. Then the question is whether such carriers have been charging the customers for portability, in violation of FCC 95-116 third order, May 1998. These companies should be show-caused and penalized for the violation of the FCC Rules and Orders, and states should subpoena the monthly LERG from these companies to review LNP capability. A refund in a top 100 MSA for 6-12 months of portability charges without being LNP capable could run in the \$10-\$20 million range in a 2 million number MSA range.

I invite Chairman Kennard to read my FCC 98-184 filing Feb. 14, 2000. I introduced this in the GTE review for merger with Bell Atlantic. If you aren't LNP capable, you can't port, and you sure as God can't pool.

2. 75% Utilization Thresholds, period.

I am humored by Verizon wireless' comments. Utilization thresholds were portrayed as inaccurate. Months to exhaust was portrayed as "credible evidence." Before 1993, your NANPA administrator, Bellcore, used utilization thresholds as a measurement of usage, before NXXs were allocated. This is not new. MTE allowed more numbers to move out the door, so to speak. Numbers were turned off in the field, left on at the switch, and so fill rates looked higher, when you pulled them from the rate center.

Now, we can't pad anymore.

I am disturbed that the best arguments that the Verizon and Sprint attorneys can give is that high utilization thresholds will disturb their accounting procedures, as certain

accounts (prepaid, resellers) are allocated to certain functions. Not having an area code split in Tampa Bay so I wouldn't lose customers did not keep our area code from splitting. Welcome to the 21st century, gentlemen. We all feel your pain. Find a more creative way to invent new accounting procedures. If fill rates are low because you want to keep track of certain businesses, then you won't get new numbers, period.

In Florida, I observed through the 1,000-block number pooling "working" committee that code holders retain many codes with very low level of utilization. I am very much concerned with the FCC's way of evaluating this need. There should be a utilization criteria, and it should be kept at least 75 percent. I support all the state commissions who favor such a percentage. Curiously, the FCC tentatively concludes that a "nationwide utilization threshold for growth numbering resources should be initially set at 50%", and would "increase by 10% annually until it reaches 80%". (Id.) The FCC's tentative conclusion is puzzling because the range - 50 to 80 percent - is lower at both ends than the range parties recommended in their comments. I believe the range should be much smaller and have a higher floor.

3. NANPA-the real problem

NANPA's study indicated that the area codes in the nation will exhaust by 2007. NANPA expresses each NPA by an exhaust date. It does not express the NXX's being released as a percentage, which is more logical. And since these are the PUBLIC'S NUMBERS, why aren't they on a web site, showing percentage allocation? How does NANPA know when an area code will exhaust? When a new competitor came into the 305 Key's area code, the area code exhausted over 30 years early. By NANPA (Martin Lockheed's) own website, third quarter 1999, over 3 times the NXX's were allocated. So, if NANPA has an increased allocation of NXX's do they go back into EACH NPA and reset the exhaust date?

The Florida PSC had over 5 area codes in jeopardy relief in a 2 year period. Not knowing when area codes were approaching the 80% NXX allocation mark did not allow

enough money for state budget planning. Over 40% of the budget went for jeopardy relief hearings, reviews, staff, travel, phone expenses for the PSC. Of course, any review of compliance for the Telephony Industry during that time frame went out the window. Never mind the burden for changes by consumers and small businesses, who are over 40% in the Tampa Bay area and alone have gross revenues of less than \$1million dollars and employees less than 10. (Clearwater Chamber of Commerce 1999). NANPA's lack of appropriate reporting could show a gross loss of income nationwide in the \$ billions: for State PSC's, residential customers and the business communities.

The FCC has allowed NANPA to be funded by the Telecommunication Industry. In return, the Industry loves "Grandpa." Every filing by the Industry BEGS the FCC to allow NANPA to monitor utilization thresholds. The Industry BEGS the FCC not to allow state PSC's to review and fine. The Industry then reminds the FCC that they have spent untold hours making the rules for themselves to follow. NANPA does not fine, punish, or revoke licensure. The Industry, through NANC and INC cannot continue to be the sole visionary for the Public's resources. THESE ARE THE PUBLIC'S NUMBERS. Allow the states a voice. Allow the BIG MAMA's control of their children. Or you will have chaos. The states have had their own meetings. The states PSC area all asking for 75%. Give it to them!

Review of growth codes should be in concert with the states before codes are released from NANPA. One or two extra weeks will not put any code holder out of business. These companies are screaming about 1000's of phone numbers being released. Let me remind you, from every filing I have read, NO ONE IS TALKING ABOUT HOW MANY DOWNGRADES OR DISCONNECTS THEY HAVE. In the cellular phone industry, it could be at least 40% change of subscribers in one year. I challenge a cell phone company to prove otherwise.

4.. Taxation without Explanation: THE FCC SHOULD ENSURE THAT LNP RELATED COSTS ARE NOT RECOVERED TWICE

The FCC requests additional cost information, including costs studies that quantify shared industry and direct carrier-specific costs of thousands-block number pooling.

(□ 253.) I believe that carriers are much better positioned to provide the Commission with estimated costs of implementing thousands-block pooling. I, however, support the FCC's intent to ensure that carriers cannot double recover LNP costs; (□ 216.) I STRONGLY urge the FCC to check the industry's filed tariffed rates and costs associated with making LNP available in the top 100 MSAs. It is a bad habit to break, but the ILEC's are not monopolies anymore, and so should not expect cost plus reimbursement.

After quoting the FCC 00-104 order, that number pooling costs would closely follow the formula used for number portability costs in the FCC 95-116 order, (docket 981444TP Florida PSC) I was in shock how ignorant the Attorneys representing the Industry were. The state attorneys had not read the FCC filing and order, and neither had some of the Commissioners! But, Bellsouth did not miss a beat screaming it expected INTRASTATE reimbursement, a cost cap method. Out of state pooling calls and in state calls do not travel along different wires. But in Florida, monopolies exist on paper.

As the FCC suggests, the federal surcharge recovery mechanism established for LNP cost recovery is already compensating carriers for deployment of LNP technology. Since LNP technology was equipment updating and implementation of 1,000-block pooling software upgrading, and pooling co-ordinator shared costs, carriers should not be allowed to include LNP-related costs in their estimates of pooling costs.

Let's also remember, these numbers "are the Public's numbers." If I port my number from you, it's because the price and/or technology was better with a competitor, and the Portability act says, "These are my numbers." If your prices and/or customer service are poor, why are you expecting the PUBLIC to foot the bill? And pooling occurs when you have inefficiency in allocating numbers out of sequence, or under usage and/or hoarding unused numbers. Why is POOR BUSINESS PRACTICES BY THE INDUSTRY DESERVING OF REIMBURSEMENT?

NANP expansion is estimated to be between (by the FCC) \$50 and \$150 billion." Let's not kill the baby we're sharing, OK?

5.. CMRS carriers should participate pooling in July 1, 2001

In paragraph 249, the FCC seeks comments related to CMRS carriers's participation in pooling upon expiration of the LNP forbearance on November 24, 2002. Florida is very concerned that the majority of the area codes which are currently in jeopardy are due to CMRS carriers. Based on our latest utilization survey, we observed that the CMRS carriers have more COCs than the wireline carriers in some rate centers.

If CMRS carriers are not required to participate in any pooling trials, the efficiency of pooling would be greatly affected. Most wireline carriers (ILECs) showed that they have high number utilization. Therefore, we ask the FCC to reconsider its November 24, 2002, deadline, and recommend that the CMRS carriers must start participating to the pooling trials in July of 2001. We believe that the CMRS technology is rapidly increasing, and therefore we believe that CMRS providers would be able to join the pooling trials to delay the exhaustion of area codes.

The FCC asks whether "covered CMRS carriers should be required to participate in pooling immediately upon expiration of the LNP forbearance period on November, 24, 20002". My technical and unqualified answer is "yes".

Covered CMRS providers received an extension of time in early 1999 from the FCC to deploy LNP technology, and that extension of time, as the FCC noted, expires in November, 2002. By then, covered CMRS providers will have had almost four full years, just from the FCC's granting of an extension of time, to deploy LNP technology and to prepare for number pooling. From all indications I've read and heard, that a shorter period less than four-year period should be adequate. Every carrier I have spoken to has stated an intent to meet the deadline. Not one carrier has identified a single technical obstacle that would be difficult or impossible to overcome by November 24, 2002. Indeed, I read in California Commission's (CPUC) filing that one major CMRS carrier recently informed CPUC staff that it would be able to both port and pool numbers

by the November, 2002 deadline. The carrier did explain, however, that its individual ability to pool would be meaningless without a simultaneous nationwide cut over of all covered CMRS providers.

In DA 99-781, the Network Services Division, pursuant to delegated authority, denied a petition by Pacific Bell and Nevada Bell for additional waivers of the Commission's dialing parity rules beyond the May 7, 1999 dialing parity implementation date. In their April 2, 1999 petition, Pacific Bell and Nevada Bell (the SBC LECs) had argued that "both companies need to perform system modifications to implement full intraLATA toll dialing parity and cannot do so in time to meet the May 7, 1999 date". (DA 99-781, ¶ 11.) In denying the SBC LECs' request, the Network Services Division stated that the LECs' "failure to reprogram their network to comply with the Commission's May 7 deadline does not constitute a special circumstance that warrants deviation from the Commission's dialing parity rules". (Id., ¶ 13.) In that instance, the SBC LECs had been put on notice in 1996 that the FCC's rules required all LECs to implement dialing no later than February 8, 1999.¹ In FCC 99-54, following issuance of the Supreme Court's decision in AT&T v. Iowa Utilities Board², the FCC had granted an extension of its deadline for implementing dialing parity from February 8, 1999 to May 7, 1999. Despite knowing of the requirement to implement dialing parity by May 7, 1999, the SBC LECs alleged a technical inability to meet the deadline. NSD flatly rejected that contention.

Similarly, here, covered CMRS providers already have known of the FCC's November 24, 2002 deadline for implementation of LNP for over a year. One of the primary applications of LNP technology is for number pooling. Given the high level of area code activity across the nation for the past two years, covered CMRS providers have been on notice that deployment of LNP technology would be coupled with the need to implement pooling. As noted above, at least one carrier has informed the CPUC that it will be able to perform both functions by that November, 2002 deadline. California urges the FCC

not to allow additional time, especially given that carriers still have, as of May 1, 2000, two years and seven months until that deadline comes to pass.

Further, the FCC should be acutely aware of what is at stake in allowing even one month's delay in requiring covered CMRS providers to engage in number pooling. In the 310 NPA in Los Angeles, wireless carriers hold upwards of close to 200 NXX codes, or 25% of the total quantity of NXX codes allocated in that area code.³ Wireless carriers hold approximately 466,000 unused numbers in the 310 NPA.⁴ Of those 466,000 unused numbers, 254 thousand-blocks are 0% contaminated, while another 141 thousand-blocks are contaminated from 0 to 10%.⁵ Thus, hundreds of 1,000-blocks would be available for pooling today in the 310 NPA if covered CMRS providers were technically capable of pooling.

Each day of delay is a day that covered CMRS providers must continue to draw numbers in blocks of 10,000 regardless of their need or their usage. In four California NPAs with pooling trials slated for this year, CMRS providers continue to draw numbers in blocks of 10,000 for the next thirty months. At the same time, LNP-capable carriers draw numbers in blocks of 1,000. If the CMRS providers draw just one code per month over the next 30 months, each of them would hold a total of 300,000 numbers compared to a total of 30,000 they would draw if they could participate in pooling. Certainly, the CMRS providers might draw significantly more numbers than 30,000 over those 30 months if they could pool, but their need may well be for fewer than the 300,000 numbers they could obtain. To California and me, it seems inherently unfair to allow CMRS providers additional time to draw numbers at ten-fold the rate of pooling carriers, thus continuing to compromise the longevity of California and Florida's area codes.

6. Mandatory thousand pooling in top MSAs at least 6 NPAs per quarter

We believe that the current technology allows carriers to be able to port numbers at high levels and implement thousand-block number pooling. Therefore, we recommend

that at least 6 NPAs per quarter per region from the top 100-MSAs, pooling should be implemented. During the Florida Commission's May 5 Agenda Conference, Brent Struthers stated that the roll-out schedule could be faster and could implement more than what the FCC required so. If they are able to do so, they should hire new people, and implement more than 6 NPAs per quarter per region (or state). The sooner we start pooling, the sooner we will solve the problem caused by the industry. Thus they should suffer if they have do. Customers are tired of changing area codes. Customers tired of losing business customers, because the area codes change so fast.

Customers WILL OBJECT and NOT PAY ANY FEES for something that the industry created. The Public should have a voice.

7. Unreliable NANPA EXHAUST STUDY

I do not believe that NANPA's area code exhaustion predictions are accurate. I also do not believe that NANPA's exhaust study involving the effect of pooling is accurate. The proposed list of assumptions for the NANP exhaust study, designed to reflect the impact of number pooling as directed in the FCC NRO Order are the following assumptions used in the development of the July 2000 NANP exhaust projection prepared by NANPA. This study attempts to reflect the impact of the FCC's Number Resource Optimization Order CC Docket No. 99-200, issued March 31, 2000, which orders number pooling to be implemented in the top 100 MSAs. This study does not attempt to reflect the impact of the other number optimization measures identified in the FCC NRO Order (e.g., utilization thresholds, reduction in code activation interval from 6 months to 60 days, requirement for evidence of network readiness for initial codes).

1. The NANP exhaust study uses as its basis the CO code demand calculated for each respective NPA. The monthly CO code demand as calculated in the NPA exhaust analysis is straight-lined approach to determine demand outside the five-year time frame included in COCUS submissions.

2. For NPAs in currently rationing, a non-rationed demand was developed. This demand is applied in the rationed NPA beginning 4/1/00. Nevertheless the NPA may be

in rationing for several months (note that the current set rationing rate imposed by the FCC is 6 months) beyond 4/1/00. Thus I recommend that the FCC adopts a sticker rationing procedure. For example a 3 month for this purpose should be used.

3. The study uses 1/1/2003 as a date by which the impact of pooling will be felt in the CO code assignment rate for all pooling NPAs. The specific date for when pooling will begin for these individual NPAs is unknown. Using the FCC NRO Order, 21 NPAs will implement pooling per quarter (84/year) in the top 100 MSAs. Assuming that the national pooling begins 4Q01, the top 100 MSAs will be completed by 1/1/2003. Therefore, the study reflects at least 55% reduction in the number of CO codes assigned in each NPA in the top 100 MSAs starting 1/1/2003.

4. CMRS providers only use NXXs from a small percentage of wireline rate centers. Consideration must also be given to the fact that separate pools may be required. Wireline uncertainties and assumptions do not generally apply to CMRS providers. carriers versus CMRS is quite distinguishable. Pooling by wireline versus pooling by wireless is going to be a challenging one in that the effects of pooling may not be separated easily.

6. There were not any assumptions made with regard to the relief method implemented (i.e., NPA split vs. overlay). However, it was assumed that the selected relief method did not require the duplication of NXX codes. I believe that as long as the lives of the area codes in the split are about the same, the overall effect should be the same. I think this is something that the state commissions and the INC guidelines are pushing it.

7. The CO code demand for an exhausting NPA will be continued after relief. By doing so, the demand for both the existing and new NPA codes will be taken into account.

My questions to the FCC will be how the number of rate centers by NPA, NPA demographics, and the new entrant demand will be accounted for in this study.

8. Mandatory use of NPAC software release 1.4 pooling until and if ever NPAC software release 3.0 becomes available.

It's been our observation that there is great deal about which software release should be used. NANPA states that release 3.0 has Efficient Data Representation (EDR) capability. However, this software is not available until December of 2000 according to NeuStar and the industry. I believe that this new software must be compatible with software release 1.4. I also believe that software release 3.0 may not be available on time as it is predicted. During the Docket No. 981444-TP meetings, Brent Struthers states that the delays are a possibility. There is no way they will be able to keep their promise. Have they ever? Look at the area code exhaustion projections? They are all wrong. What did the industry do? BellSouth tried to sue a staff person at the Florida Commission because they did not like the staff's alternatives and area code exhaustion dates. But NANPA used the same methods and calculations. I think what BellSouth is doing is try to eliminate any active staff in this docket and keep them away by scaring the Commission.

CMRS providers cannot use NPAC 1.4 or 3.0. They have to use their own AIN (Artificial Intelligence Software) especially for billing purposes. NPAC 1.4/3.0 is not compatible with AIN 0.0/0.4. How the pooling will take place to solve the numbering exhaust in the nation is very QUESTIONABLE. As a customer, user, I am very much concerned. Last year, I was told that this software was going to be available this winter.

But now, I hear that due to some technical issues, there has been a delay. Therefore, I ask that software release 1.4 should be used until and ever if software release 3.0 become available.

I affirm and marvel that Nortel has identified a way to release numbers in 1000 block in top 100 MSA's that are implementing number pooling. According to 1996 Telecommunication's Act, section 251 it is NOT competitively neutral for 10,000 block numbers to be released to CMRS providers FOR ANOTHER 2 YEARS while the land line companies simultaneously will be released ONLY 1000 blocks. It is also a nightmare for administration. Upon reading the Office of Consumer Advocates (the big 10) filing, I DEMAND that FCC review the Nortel Network proposal to INC to define

routing for the LERG definition of reporting 1000 block allocation for non-LNP capable carriers (pg 21).

9. Models for AIN-Based Local Number Portability

I believe that various technical AIN-based LNP models must be developed to handle large volumes of pooling. We heard about the SCP capacity might be overwhelmed if everyone wanted to port their numbers back and port. Will this ever happen? Not now, but once the geographic portability takes place, this problem will exist with no question.

I ask you to examine the reports that show the statistics about how Americans move from one state to another. Job opportunities, attending schools and colleges in different states are the main concerns that companies should be concentrated on. Yes, this SCP based problem will take place. No one needs to predict it, since it is obvious. Currently, the European Community (EU) is proposing that LNP be required for major population centers by 2003. The technical solutions to implementing this vary by country, although all agree that the best term approach uses the Advanced Intelligent Network (AIN) capabilities of the PSTN.

1. In April of 1998, the Australian competition and consumer commission issued pricing principles for local number portability. Did the FCC examine this report?
 2. In October of 1997, the United Kingdom government initiated number portability trials. Did the industry examine this?
 3. V. Toth in the Business Communications Review 21, 10 in October of 1991 on page 64 has an article titled What price number portability. This is a good article to read, I recommend it.
 4. Beta Scientific Laboratory, Inc. provided a report in November 1999 regarding how the number puzzle can be resolved. Their solutions retain 7-digit dialing for all local calls without an overlay of 10-digits as the industry wants. I recommend that you check betalab.org.
 5. Check Mr. Gilbert Yablon's approach to solve the 7-digit problem by adding a suffix.
- I think this is a great solution to the current numbering problem. Why change the area

codes from 3-digits to 4 to 5 digits? Just add a suffix for the areas where there is an overlay. I recommend you check www.smartoverlay.com.

6. System beta solution in 4 and unified dialing plan for overlays in 5 are the main issues that the industry, the FCC and the state commissions should examine very carefully. There is a big potential out there. The industry is ruling the game. So, let's stop it NOW.

In conclusion, I thank the FCC for its efforts to address and solve the numbering crisis puzzle, and hope that the FCC, the state commissions, the "industry", and individuals will be more cautious to stop the number exhaustion issues for the United States. We are expecting all you kind people making money off the numbers you create technology with to have a sense of stewardship FOR THE PUBLIC'S NUMBERS. And I am admonishing Congress to stop treating The 1996 Telecommunication's Act like the holy grail and see fit to modify where needed, as to preserve a dwindling resource. It's not UNMANLY for a horse to go from a gallop to a fast trot.

Respectfully submitted,



Peggy Arvanitas

DATED: 6/6/00

1 See FCC 96-333, Second Report and Order and Memorandum Opinion and Order, released August 8, 1996, ¶ 59; see Rule 51.211.

2 119 S.Ct. 721 (1999).

3 Report on the 310 Area Code, CPUC Telecommunications Division, March 16, 2000, Figure 1, p. 27. Since the 310 Report issued, wireless carriers have obtained additional NXX codes in the 310 lottery.

4 Id. at 31.

5 Some of these blocks are held by non-covered CMRS providers and would not be available for pooling, even after the November, 2002 deadline.

Peggy Arvanitas's Reply Comments
CC Docket No. 99-200

CERTIFICATE OF SERVICE

I, Peggy Arvanitas , do hereby certify that copies of Comments of Peggy Arvanitas on Further Notice of Proposed Rulemaking in CC Docket No. 99-200, were served by first class United States Mail, upon the parties appearing on the attached service list on the date set forth below.


Peggy Arvanitas

June 8, 2000

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CYNTHIA B MILLER FLORIDA PUBLIC SERVICE COMMISSION 2540 SHUMARD OAK BLVD TALLAHASSEE FL 32399-0850	M. ROBERT SUTHERLAND THEODORE R. KINGSLEY BELLSOUTH CORPORATION 1155 PEACHTREE STREET, N.E., SUITE 1700 ATLANTA, GA 30309-3610
JOHN F. RAPOSA GTE SERVICE CORPORATION 600 HIDDEN RIDGE, HQE03J27 P.O. BOX 152092 IRVING, TX 75015-2092	JOHN M GOODMAN BELL ATLANTIC 1300 I STREET NW SUITE 400 WEST WASHINGTON DC 20005
TINA S PYLE RICHARD A. KARRE MEDIAONE GROUP, INC. 1919 PENNSYLVANIA AVENUE, NW SUITE 610 WASHINGTON, DC 20006	PETER ARTH JR LIONEL B WILSON HELEN M. MICKIEWICZ STATE OF CALIFORNIA PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102

Service List

LAWRENCE STRICKLING CHIEF, COMMON CARRIER BUREAU FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W. WASHINGTON, DC 20554	KEVIN MARTIN LEGAL ADVISOR OFFICE OF COMMISSIONER HAROLD FURCHGOTT-ROTH FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W., ROOM 8-A302 WASHINGTON, D.C. 20554
YOG VARMA DEPUTY CHIEF COMMON CARRIER BUREAU FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W. WASHINGTON, DC 20554	DAN CONNORS LEGAL ADVISOR OFFICER OF COMMISSIONER SUSAN P. NESS FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W., ROOM 8-B115 WASHINGTON, D.C. 20554
BLAISE A. SCINTO DEPUTY CHIEF, NETWORK SERVICES DIVISION COMMON CARRIER BUREAU FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W., SUITE 6-A207 WASHINGTON, DC 20554	AL MCCLOUD NETWORK SERVICES DIVISION COMMON CARRIER BUREAU FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W. WASHINGTON, DC 20554
DOUGLAS PRICHARD CITY MANAGER ROLLING HILLS ESTATES 4045 PALOS VERDES DRIVE NORTH ROLLING HILLS ESTATES, CA 90274	THOMAS SUGRUE CHIEF, WIRELESS TELECOMMUNICATIONS BUREAU FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W. WASHINGTON, DC 20554